

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Federal-State Joint Board on
Universal Service

Forward-Looking Mechanism for High
Cost Support for Non-Rural LECs

CC Docket No. 96-45

CC Docket No. 97-160

REPLY COMMENTS OF VERIZON¹

The commenters universally support, or do not oppose, updating the loop portion of the universal service proxy model to use the Delphi programming language in place of the obsolete Turbo-Pascal language. *See* Verizon at 1-2; Joint Commenters at 2-4; AT&T at 1-2; WorldCom at 1. However, as Verizon and the Joint Commenters point out, Visual Basic would be a superior choice in terms of ease of use and consistency with the rest of the model. Qwest has already done the work of converting the loop module to Visual Basic and it has submitted a beta version of this conversion to the Commission. *See* Joint Commenters, n.6. The Commission should use this opportunity to adopt Visual Basic throughout the model.

AT&T and WorldCom took advantage of the public notice to reargue issues concerning the model platform and model inputs that the Commission already rejected or that they raised previously in *ex parte* filings, which Verizon has already refuted. For instance, AT&T repeated

¹ The Verizon telephone companies (“Verizon”) are the affiliated local telephone companies of Verizon Communications Corp. These companies are listed in Attachment A.

arguments concerning customer locations, sharing of feeder and distribution plant, placement of host and remote switches, infrastructure sharing, mix of underground and aerial cable, and cost of digital loop carrier equipment, that the Commission considered and rejected in the *Tenth Report and Order*. *See Federal-State Joint Board on Universal Service; Forward-Looking Mechanism for High Costs Support for Non-Rural LECs*, Tenth Report and Order, 14 FCC Rcd 20156, ¶¶ 36-39, 243-249, 274-285, 320-323 (1999). AT&T and WorldCom also repeat arguments from AT&T's February 16 and 28, 2000 *ex parte* filings regarding the loop portion of the model platform that Verizon refuted in its April 14, 2000 *ex parte* letter. *See* letter from W. Scott Randolph, GTE Service Corp, to Magalie Roman Salas, FCC Secretary, CC Docket Nos. 96-45, 97-160, filed April 14, 2000.

The Commission should reject these arguments for the same reasons that it did before, and for the reasons that Verizon explained in its response to AT&T's *ex parte* filings. AT&T and WorldCom present no new information that would warrant changing the decisions that the Commission has already made after thoroughly considering AT&T and WorldCom's extensive submissions in this proceeding. AT&T and WorldCom rely primarily on their own comments filed prior to the Tenth Report and Order, and already considered. For instance, AT&T once again argues (at 8-11) that the Commission should use "geocode" data to determine customer locations. However, the Commission correctly concluded that there is no reliable source of such data, and AT&T is incorrect in claiming, as it did before, that this information is "readily available" in the incumbent local exchange carriers' records. Similarly, AT&T reiterates (at 12-13) its disagreement with the use of existing host and remote switch locations, but presents nothing new. Nor do AT&T and WorldCom provide any new information to show that their

proposed changes to the cost inputs or model platform algorithms would improve the model's ability to approximate actual forward-looking costs. Verizon demonstrated in its response to AT&T's *ex parte* filings that AT&T's proposed changes to the model platform would exacerbate, not solve, the model's current deficiencies.

To the extent that these comments present new criticisms of decisions that the Commission made in its orders adopting the model platform and inputs, they constitute untimely petitions for reconsideration. In addition, they go far beyond the scope of the Public Notice. If the Commission wanted to reopen the broader issues of model platform and inputs, it would have to start a new rulemaking proceeding in which it would provide public notice and an opportunity for comments. For these reasons, the Commission should reject the extraneous arguments raised by AT&T and WorldCom.

Conclusion

For the foregoing reasons, the bureau should update the model by adopting Visual Basic for the loop module, and it should reject the proposals by AT&T and WorldCom to make substantive changes to the model platform and inputs.

Respectfully submitted,

Of Counsel
Michael E. Glover
Edward Shakin

By: /S/
Joseph DiBella
1320 North Court House Road
Eighth Floor
Arlington, VA 22201
(703) 974-6350
joseph.dibella@verizon.com

Attorney for the Verizon
telephone companies

Dated: August 27, 2001

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc